

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. CR-18-227-SLP
)	
JOSEPH MALDONADO-PASSAGE,)	
a/k/a Joseph Allen Maldonado,)	
a/k/a Joseph Allen Schreibvogel,)	
a/k/a “Joe Exotic,”)	
)	
Defendant.)	

UNOPPOSED MOTION TO CONTINUE JURY TRIAL

The United States of America moves the Court to continue the November 7, 2018, jury trial in this matter by one month to the Court’s December 4, 2018, jury trial docket.

In support of this motion, the government states:

- 1) Mr. Maldonado-Passage was indicted on September 5, 2018, on two counts of use of interstate commerce facilities in the commission of murder-for-hire, in violation of 18 U.S.C. § 1958(a).
- 2) Mr. Maldonado-Passage appeared for arraignment before United States Magistrate Judge Bernard Jones on September 27, 2018, with jury trial to commence within 70 days under the Speedy Trial Act.
- 3) Magistrate Judge Jones scheduled the jury trial on this Court’s November 7, 2018, jury trial docket.

4) On October 4, 2018, Magistrate Judge Jones conducted a detention hearing and subsequently ordered Mr. Maldonado-Passage to be detained pending trial.

5) Counsel for the United States requests that the Court grant a one-month continuance of the jury trial to the trial docket beginning December 4, 2018. The United States requests this continuance in order to complete additional investigation into Mr. Maldonado-Passage's criminal activities.

6) If trial were set to commence on December 4, 2018, a total of 68 days would have elapsed between Mr. Maldonado-Passage's arraignment and the commencement of trial.

7) Defense counsel for Mr. Maldonado-Passage concedes that the requested continuance does not implicate the time constraints of the Speedy Trial Act.

8) No other motions for continuance have been made.

Respectfully submitted,

ROBERT J. TROESTER
First Assistant United States Attorney

s/Amanda Green
AMANDA GREEN
Assistant U.S. Attorney
OBA No. 19876
210 W. Park Avenue, Suite 400
Oklahoma City, Oklahoma 73102
(405) 553-8700 (Office)
(405) 553-8888 (Fax)
Amanda.green@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2018, I electronically transmitted this document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Assistant Federal Public Defenders:

William P. Earley

Kyle E Wackenheim

s/Amanda Green

AMANDA GREEN